

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff

VS.

ANGEL MARTIN-LARA

Defendant(s)

) Case No. 3:20-mj-00003-DMS
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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I Wendy Terry, being first duly sworn upon oath, hereby depose and states as follows:



BACKGROUND AND EXPERIENCE OF AFFIANT

1. I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I have been employed by the FBI as a Special Agent since June 2014. I am currently assigned to the Violent Crime Squad in the FBI Anchorage Field Office. During my time with the FBI, I have lead and participated in investigations involving violent crimes, threats, robbery, drugs, and child pornography. I have also been an affiant on multiple federal

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search warrants seeking information relating to investigations of threats, robbery, drugs, and child pornography offenses. Prior to June 2014, I was employed with the Savannah Chatham Metropolitan Police Department (SCMPD) in Savannah, Georgia, as a Police Officer and Detective. As a Police Officer and Detective, I was assigned to the Patrol Unit, Crime Suppression Unit, Property Crimes Detective Unit, and Homicide Detective Unit. During these assignments I led and participated in a large number of property crime investigations; led and participated in a large number of drug-related arrests, including buy-bust operations, reverse buy operations, and surveillance operations; and assisted in the preparation and execution of numerous search warrants and arrest warrants. The execution of these search and arrest warrants led to, among other things, the seizure of communication devices, computers, and other documents relating to the transportation, ordering, purchase and distribution of controlled substances; and recovery of stolen property.

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2. Pursuant to my background, training, and experience, as well as the training and experience of other law enforcement personnel with whom I have consulted regarding this case, investigation of this case has shown that:

PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of a criminal complaint against and arrest warrant for Angel Martin-Lara for the violation of Title 21 U.S.C. Sections 841, 846, 841(b)(1)(A) {Possession with Intent to Distribute Methamphetamine heroin, and Conspiracy to distribute methamphetamine and heroin}.
4. The information contained below is from my personal knowledge, from other law enforcement agents and officers, or from specific sources as set forth. It does not

include all the information known to me as part of this investigation, but only information sufficient to establish probable cause.

PROBABLE CAUSE



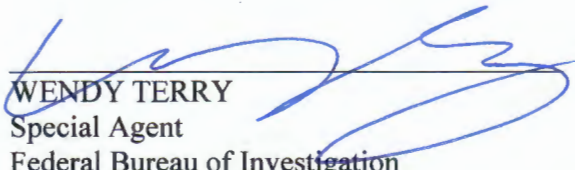
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5. On December 20, 2019, acting on information received from investigators with the Statewide Drug Enforcement Unit, members with the Airport Interdiction Team (AAIT) and Federal Bureau of Investigation executed a controlled purchase of heroin from ANGEL MARTIN-LARA of 1 ounce of heroin for \$2,000, from MARTIN-LARA's residence.
6. Subsequently, on January 3, 2020 members of the AAIT executed a state search warrant (3AN-20-00024SW) at MARTIN-LARA's residence, yielding in the seizure of 2828grams of heroin (6.23lbs), 3190 grams of methamphetamine (7lbs), 17 grams of cocaine, 627 grams of marijuana, \$60,394 in cash drug proceeds, and 13 firearms, both handguns and long guns.
7. MARTIN-LARA was arrested and remanded to the Anchorage jail.
8. In my training and experience, and in speaking to other investigators, this amount of methamphetamine has an approximate wholesale value of \$84,000; heroin has an approximate wholesale value of \$192,000, resulting in a street value far exceeding that for sales of user quantities.
9. Based on the foregoing, I submit that there is probable cause to believe that Angel Martin-Lara possessed with intent to distribute 500 grams or more of methamphetamine and heroin {Title 21, U.S.C. Section 841(a)(1), (b)(1)(A)}, and conspired to distribute over 500 grams or more of methamphetamine {Title 21 U.S.C. Section 846, 841(b)(1)(A)}.

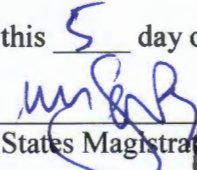
Further the Affiant sayeth not.

DATED at Anchorage, Alaska, this 5 day of Jan, 2020.

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WENDY TERRY
Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me this 5 day of Jan


United States Magistrate Judge

